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6 UNITED STATES BANKRUPTCY COURT  
7  
8 NORTHERN DISTRICT OF CALIFORNIA  
9  
10 (SAN FRANCISCO DIVISION)

11 Theresa Ann McDonald

12 Appellant

13 vs.

14 PG&E Corporation

15 And

16 PG&E Gas and Electric Company

17 Appellees

Bankruptcy Case No. 19-30088-DM

Chapter 11

(Lead Case)

(Jointly Administered) Case

No. 19-30089-DM

Proof of Claim No. 54975

Filed October 21, 2019

Camp Fire

JUDGE: Hon. Dennis Montali

21 APPELLANT'S DESIGNATION OF  
22 RECORD AND STATEMENT OF ISSUES  
23 ON APPEAL FROM BANKRUPTCY  
24 COURT

25 The bankruptcy court erred when it allowed the case to move through Confirmation with  
26 the following difficulties:

- 27 1. self-contradictory language in the Confirmation Order itself. That such problems  
28 were not caught and corrected demonstrated the Court rushed the decision so that

1 PG&E could obtain its funding and emerge from bankruptcy by that all important  
2 date of June 30, 2020, in time to qualify for participation in the AB 1054's  
3 Wildfire Fund;

- 4 2. failing to obtain an Estimation of Total Damages as required by 11 U.S.C.  
5 Section 502(c), 28 U.S.C. 157(b)(2)(B) and 28 U.S.C. 157(c)(1), despite multiple  
6 requests that such an Estimation be made prior to Confirmation;
- 7 3. approving the Fire Victim Claims Resolution Procedures and Release and  
8 Indemnification Forms even though they deny access to the courts for final  
9 resolution of settlement disputes to all but a handful of fire victim claimants  
10 identified in the Confirmation Order (there is currently a motion before the  
11 Bankruptcy Court to revise the language in the Confirmation Order to extend  
12 access to the courts to thousands more fire victim claimants but that motion has  
13 not yet been ruled upon. Even if the motion is approved the Fire Victim Claims  
14 Resolution Procedures will still deny access to the courts to thousands of victims,  
15 who for whatever reason did not return a vote, to resolve potentially inequitable  
16 settlement decisions by the Fire Victim Trustee);
- 17 4. failing to ensure that the types of damages included or excluded from  
18 compensation in the proposed Restructuring Plan the impaired class claimants  
19 received to vote upon was explained;
- 20 5. failing to ensure that the Official Committee of Tort Claimants (the TCC) was  
21 meeting its obligation to keep the claimants it was charged with representing  
22 informed about important matters in the bankruptcy case;
- 23 6. confirming a Plan where the Fire Victim Trust Agreement which holds victims'  
24 compensation hostage to the signing of releases that are unconscionable and  
25 possibly contrary to California law and public policy;
- 26 7. allowing the settlements with the Tubbs Fire Preference Claimants and the 2015  
27 Butte Fire Claimants to be sealed, when that information is essential to properly  
28 calculate of an Estimation of Total Damages;

8. requiring claimants to vote on a Reorganization Plan when key elements had yet to be determined instead of requiring parties to reach an agreement before the Plan could be submitted for voting;
9. allowing the Solicitation Packet to be sent out for a vote when it contained no information to allow voters to determine if the proposed aggregate settlement amount of \$13.5 billion for fire victims was based upon anticipated full compensation of all costs allowed under California law or a discounted rate of compensation;
10. allowing the Solicitation Packet to be sent out without a clear statement understandable by the average person with a high school education that the \$13.5 billion aggregate settlement amount being offered was actually worth a minimum of \$6.75 billion and a maximum of more than \$13.5 billion, depending upon the unknowable future value of as yet undetermined number of shares of stock that was being transferred into the Fire Victim Trust;
11. failing to treat similarly-situated fire victim claimants in a similar manner. The Tubbs Preference Fire Victims were allowed to pursue their claims in State Court, supposedly because the resolution of those claims would provide important information for the Estimation of Damages, yet the pre-trial settlement of those claims was sealed. Therefore, these 50 claimants received the benefit of knowing what their approved settlement amount will be, and there was no benefit to the remaining claimants and in fact no Estimation of Total Damages was ever made.
12. extending the period of Exclusivity for the Debtors, effectively denying the fire victim claimants the opportunity to be presented with more than one option to resolve the bankruptcy. There were other offers, one of which reportedly would have provided an all-cash settlement of \$13.5 billion to the fire victims, but we were never allowed to see or consider those offers. Instead we were given a "take it or leave it" offer, with no time or opportunity to insist on something



1 better.

2 13. failing to resist pressure from the California Legislature to reach a hurried and  
3 flawed resolution to the bankruptcy in to ensure that PG&E would be able to  
4 participate in AB 1054 Wildfire Fund protection. The Court repeatedly referred  
5 to the necessity to ensure that PG&E emerged from bankruptcy by June 30, 2020.  
6 It seems clear that the need to protect PG&E's ability to participate in AB 1054's  
7 Wildfire Fund was assigned greater importance than the need to ensure that fire  
8 victims were compensated in as fair, equitable, and timely a means possible. The  
9 federal judiciary cannot afford to let the legislature put time limits on legal  
10 proceedings, even if the limit is only expressed as a penalty to be imposed upon a  
11 litigant in a case. The federal judiciary cannot afford to let the state executive  
12 branch intimidate it by threatening to seize control of one litigant. If the State of  
13 California is allowed to think it can get away with that type of tactic, it won't be  
14 the judiciary that suffers, it will be the people.

15 14. failing to appoint an independent Examiner to look into the voting problems, or  
16 at least request an appearance by a representative of the firm that did the actual  
17 mailing of the solicitation materials to answer questions regarding when the  
18 mailings were sent out. Acceptance of the TCC's findings is not sufficient, as  
19 they did not address the question of possible delays in the actual mailing of  
20 materials.

21 15. failing to provide any information regarding a possible timeline for the expected  
22 payment of claims and winding down of the Fire Victim Trust. There were  
23 numerous references to a desire to pay claimants quickly, but the actual  
24 documents require the Trustee to file a 5-year budget, and the State Agencies  
25 Settlement Agreement has payouts spread out for more than 5 years. Those two  
26 factors, together with common sense that says selling off millions of shares of  
27 stock must take considerable time to receive a fair price demonstrates that the fire  
28 victims are looking at a minimum of several years to receive final payments on

1           their claims.

2           16. failing to recognize the unique position of Camp Fire claimants as the only ones  
3           with an admission of guilt for criminal conduct from PG&E, and as the only ones  
4           whose complete social support structure was destroyed by the fires. The degree  
5           of devastation from the Camp Fire is far beyond any seen in any of the other fires.  
6           It will be many more years before the Paradise Irrigation District is able to  
7           restore full water service to every lot in the Town, and possibly 10 to 20 years  
8           before the housing stock that was lost can be fully replaced. During that time the  
9           cost of building will continue to increase. There is no mention of a reserve of  
10          funds for the fire victims to draw upon to meet those increasing costs or how that  
11          will affect other claimants.

12          17. allowing the Subrogation Claimants to be put into separate classes  
13          (Class 5A-II and Class 5B-II) from other Fire Victim Claimants (Class 5A-III  
14          and Class 5B-III), with no explanation to justify the separation of the two groups;

15          18. allowing the Subrogation Claimants to reach a settlement agreement that had an  
16          actual dollar amount, even though the Estimation of Total Damages required by  
17          11 U. S. C. 502(c) had not been made and the Court had no means of knowing if  
18          the amount offered to actual fire victims would fully compensate them for their  
19          losses;

20          19. finally, proceeding with the confirmation of the Plan despite the Court's inability  
21          to provide a clear and workable means of communication and method for the fire  
22          victims to participate in the bankruptcy process. It was not the Court's fault that  
23          the world was plunged into a pandemic that resulted in services being shut down,  
24          but it was the Court's decision to continue with the bankruptcy proceedings.  
25          That decision may have been influenced by a feeling that it was necessary to  
26          conclude matters before June 30, 2020, so that PG&E could participate in the  
27          benefits of AB 1054's Wildfire Fund,  
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1           There are undoubtedly many small issues that will be corrected over time in the normal  
2 course of moving forward, but the issues above are too significant to be simply worked out over  
3 time. Having the hearings available to watch via Zoom made the case more accessible to fire  
4 victims, because we did not have to travel to San Francisco to see the hearings. It allowed me  
5 the ability to see things that raised great concern not only about the settlement we were being  
6 offered but about the unreasonable sense of urgency to conclude the case even if that meant  
7 compromising the quality of the result.

8           The three branches of government are supposed to be separate but equal. The  
9 independence and strength of the judiciary can best be demonstrated by correcting the issues that  
10 were caused, in part, by PG&E's constant reminders of the artificial and capricious June 30,  
11 2020, deadline for it to emerge from bankruptcy.

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**DESIGNATION OF ITEMS TO BE INCLUDED IN THE RECORD ON APPEAL**

Theresa Ann McDonald respectfully designates the following items for inclusion in the record on appeal. Each designated item also includes any and all attachments, annexed declarations, proposed orders and/or exhibits/addenda annexed to and referenced within such item.

Items from Case No 19-30088-DM *In re PG&E Corporation et al*

BANKRUPTCY DOCKET NUMBER	DATE ENTERED IN THE BANKRUPTCY DOCKET	BRIEF DESCRIPTION OF THE DOCUMENT OR TRANSCRIPT
2021	5/15/2019	DECLARATION OF ROBERT A. JULIAN IN SUPPORT OF OFFICIAL COMMITTEE OF TORT CLAIMANTS' LIMITED JOINDER, OBJECTION AND COUNTER MOTION TO DEBTORS' WILDFIRE ASSISTANCE MOTION
2741	6/25/2019	MOTION OF THE AD HOC COMMITTEE OF SENIOR UNSECURED NOTEHOLDERS TO TERMINATE THE DEBTORS' EXCLUSIVE PERIODS PURSUANT TO SECTION 1121(d)(1) OF THE BANKRUPTCY CODE
2843	7/2/2019	MEMORANDUM OF POINTS AND AUTHORITIES IN SUPPORT OF THE OFFICIAL COMMITTEE OF TORT CLAIMANTS FOR RELIEF FROM AUTOMATIC STAY TO PERMIT STATE COURT JURY TRIAL OF 2017 TUBBS WILDFIRE CLAIMS
2844	7/2/2019	DECLARATION OF ROBERT A. JULIAN IN SUPPORT OF MOTION OF THE OFFICIAL COMMITTEE OF TORT CLAIMANTS FOR RELIEF FROM AUTOMATIC STAY TO PERMIT STATE COURT JURY TRIAL OF 2017 TUBBS WILDFIRE CLAIMS
2983	7/15/2019	JOINDER TO THE MOTION OF THE AD HOC GROUP OF SUBROGATION CLAIM HOLDERS FOR RELIEF FROM THE AUTOMATIC STAY
3008	7/16/2019	THE PUBLIC ADVOCATES OFFICE'S STATEMENT OF POSITION RE: MOTION OF THE AD HOC COMMITTEE OF SENIOR UNSECURED NOTEHOLDERS TO TERMINATE THE DEBTORS' EXCLUSIVE PERIODS

BANKRUPTCY DOCKET NUMBER	DATE ENTERED IN THE BANKRUPTCY DOCKET	BRIEF DESCRIPTION OF THE DOCUMENT OR TRANSCRIPT
3009	7/16/2019	SONOMA CLEAN POWER AUTHORITY AND VALLEY CLEAN ENERGY ALLIANCE'S RESERVATION OF RIGHTS CONCERNING MOTION OF AD HOC COMMITTEE OF SENIOR UNSECURED NOTEHOLDERS TO TERMINATE THE DEBTORS' EXCLUSIVITY PERIODS PURSUANT TO SECTION 1121 (d)(1) OF THE BANKRUPTCY CODE
3010	7/16/2019	RESPONSE OF THE UNITED STATES OF AMERICA TO THE MOTION OF THE AD HOC COMMITTEE OF SENIOR UNSECURED NOTEHOLDERS TO TERMINATE THE DEBTORS' EXCLUSIVE PERIODS PURSUANT TO SECTION 1121(d)(1) OF THE BANKRUPTCY CODE
3069	7/18/2019	OBJECTION OF THE COMMITTEE OF TORT CLAIMANTS TO MOTION OF THE AD HOC COMMITTEE OF UNSECURED NOTEHOLDERS TO TERMINATE THE DEBTORS' EXCLUSIVE PERIODS PURSUANT TO SECTION 1121(d)(1) OF THE BANKRUPTCY CODE [DKT. NO. 2741]
3091	7/18/2019	DEBTOR'S MOTION PURSUANT TO 11 U.S.C. §§105(a) AND 502(c) FOR THE ESTABLISHMENT OF WILDFIRE CLAIMS ESTIMATION PROCEDURES
3430	8/7/2019	STATEMENT OF CERTAIN PG&E SHAREHOLDERS IN SUPPORT OF DEBTORS' MOTION FOR THE ESTABLISHMENT OF WILDFIRE CLAIMS ESTIMATION PROCEDURES
3431	8/17/2019	OPPOSITION OF THE OFFICIAL COMMITTEE OF TORT CLAIMANTS TO THE DEBTORS' MOTION PURSUANT TO 11 U.S.C. §§105(a) AND 502(c) FOR THE ESTABLISHMENT OF WILDFIRE CLAIMS ESTIMATION PROCEDURES
3568	8/16/2019	MEMORANDUM DECISION REGARDING MOTIONS TO TERMINATE EXCLUSIVITY
3648	8/21/2019	RECOMMENDATION FOR WITHDRAWAL OF REFERENCE OF PROCEEDING IN PART
3671	8/23/2019	ORDER ADOPTING RECOMMENDATION FOR WITHDRAWAL OF REFERENCE OF PROCEEDINGS IN PART; ORDER OF ASSIGNMENT



BANKRUPTCY DOCKET NUMBER	DATE ENTERED IN THE BANKRUPTCY DOCKET	BRIEF DESCRIPTION OF THE DOCUMENT OR TRANSCRIPT
4540	10/31/2019	ORDER ESTABLISHING PRE-CONFIRMATION BRIEFING AND HEARING SCHEDULE FOR CERTAIN LEGAL ISSUES
4553	11/1/2019	NOTICE OF DEBTORS' DESIGNATION OF CLAIMS FILED BY UNITED STATES OF AMERICA, THE STATE OF CALIFORNIA AND ADVENTIST HEALTH SYSTEM AS UNLIQUIDATED AND SUBJECT TO ESTIMATION UNDER SECTION 502(c) OF THE BANKRUPTCY CODE
4771	11/15/2019	OPPOSITION OF THE UNITED STATES OF AMERICA TO NOTICE OF DEBTORS' DESIGNATION OF CLAIMS FILED BY THE UNITED STATES OF AMERICA, THE STATE OF CALIFORNIA AND ADVENTIST HEALTH SYSTEM AS UNLIQUIDATED AND SUBJECT TO ESTIMATION UNDER SECTION 502(c) OF THE BANKRUPTCY CODE
4774	11/15/2019	RESPONSE OF THE CALIFORNIA STATE AGENCIES TO DEBTORS' NOTICE OF DESIGNATION OF CLAIMS FILED BY THE STATE OF CALIFORNIA AS UNLIQUIDATED AND SUBJECT TO ESTIMATION UNDER SECTION 502(c) OF THE BANKRUPTCY CODE
4783	11/15/2019	RESPONSE TO THE ADVENTIST CLAIMANTS' OBJECTION TO THE NOTICE OF DEBTORS' DESIGNATION OF CLAIMS FILED BY THE UNITED STATES OF AMERICA, THE STATE OF CALIFORNIA AND ADVENTIST HEALTH SYSTEM AS UNLIQUIDATED AND SUBJECT TO ESTIMATION UNDER SECTION 502(c) OF THE BANKRUPTCY CODE
4886	11/27/2019	DEBTORS' AND AD HOC SUBROGATION GROUP'S JOINT BRIEF IN SUPPORT OF THE SUBROGATION WILDFIRE CLAIMS AS IMPAIRED CLASSES FOR ALL PURPOSES UNDER THE DEBTORS' JOINT CHAPTER 11 PLAN OF REORGANIZATION
5004	12/5/2019	RESPONSE DEBETORS' RESPONSE TO THE OPPOSITIONS FILED BY THE UNITED STATES OF AMERICA, THE STATE OF CALIFORNIA AND ADVENTIST HEALTH ON CERTAIN CLAIMS SUBJECT TO ESTIMATION UNDER SECTION 502(c) OF THE BANKRUPTCY CODE

BANKRUPTCY DOCKET NUMBER	DATE ENTERED IN THE BANKRUPTCY DOCKET	BRIEF DESCRIPTION OF THE DOCUMENT OR TRANSCRIPT
5066	12/11/2019	STIPULATION BY AND AMONG THE DEBTORS, THE UNITED STATES OF AMERICA, CERTAIN CALIFORNIA STATE AGENCIES AND THE ADVENTIST CLAIMANTS RE: DESIGNATION OF CLAIMS AS UNLIQUIDATED AND SUBJECT TO ESTIMATION UNDER SECTION 502(c) OF THE BANKRUPTCY CODE
5072	1/23/2020	JOINDER BY BAUM HEDLUND ARISTEI GOLDMAN CAMP FIRE VICTIMS CLIENTS IN THE OBJECTION TO DEBTORS' MOTIONS [DKT. NO. 5282] AND [DKT. NO. 5284] FILED BY CLAIMANTS ELIZABETH ADEMS, MARY ADAMS, AND DAVID AGOSTINO, ET AL. [DKT NO. 5459]
5088	12/12/2019	ORDER APPROVING STIPULATION BY AND AMOUNT THE DEBTORS, THE UNITED STATES OF AMERICA, CERTAIN CALIFORNIA STATE AGENCIES AND THE ADVENTIST CLAIMANTS RE: DESIGNATION OF CLAIMS AS UNLIQUIDATED AND SUBJECT TO ESTIMATION UNDER SECTION 502(c) OF THE BANKRUPTCY CODE
5282	1/6/2020	DEBTORS' MOTION PURSUANT TO 11 U.S.C. §§ 363(b) AND 105(a) AND FED. R. BANKR. P. 6004 AND 9019 FOR ENTRY OF AN ORDER (I) AUTHORIZING THE DEBTORS TO SETTLE THE CLAIMS OF TUBBS PREFERENCE CLAIMANTS AND (II) GRANTING RELATED RELIEF
5283	1/6/2020	DECLARATION OF JANET ODUCA IN SUPPORT OF DEBTORS' MOTION PURSUANT TO 11 U.S.C. §§ 363(b) AND 105(a) AND FED. R. BANKR. P. 6004 AND 9019 FOR ENTRY OF AN ORDER (I) AUTHORIZING THE DEBTORS TO SETTLE THE CLAIMS OF TUBBS PREFERENCE CLAIMANTS AND (II) GRANTING RELATED RELIEF



BANKRUPTCY DOCKET NUMBER	DATE ENTERED IN THE BANKRUPTCY DOCKET	BRIEF DESCRIPTION OF THE DOCUMENT OR TRANSCRIPT
5459	1/22/2020	OBJECTION TO THE DEBTORS' MOTION PURSUANT TO 11 U.S.C. §§ 363(b) AND 105(a) AND FED. R. BANKR. P. 6004 AND 9019 FOR ENTRY OF AN ORDER (I) AUTHORIZING THE DEBTORS TO SETTLE THE CLAIMS OF TUBBS PREFERENCE CLAIMANTS AND (II) GRANTING RELATED RELIEF; AND DEBTORS' MOTION PURSUANT TO 11 U.S.C. §§ 105(a) AND 107(b) AND FED. R. BANKR. P. 9018 FOR ENTRY OF AN ORDER AUTHORIZING REDACTION AND SEALING OF CONFIDENTIAL INFORMATION FROM TUBBS SETTLEMENT DOCUMENTS
5485	1/24/2020	DEBTORS' REPLY TO THE OBJECTING CAMP FIRE CLAIMANTS' OBJECTION TO THE TUBBS SETTLEMENT MOTION [DKT. 5459] AND THE ADDITIONAL OBJECTING CAMP FIRE CLAIMANTS' JOINDER [DKT. 5472]
5571	1/30/2020	ORDER PURSUANT TO 11 U.S.C. §363(b) AND 105(a) AND FED. R. BANKR. P. 6004 AND 9019 (I) AUTHORIZING THE DEBTORS TO SETTLE THE CLAIMS OF THE TUBBS PREFERENCE CLAIMANTS AND (II) GRANTING RELATED RELIEF
5971	2/28/2020	NOTICE OF FILING OF SUBROGATION WILDFIRE TRUST AGREEMENT
6049	3/17/2020	NOTICE REGARDING/NOTICE OF FILING OF PROPOSED FIRE VICTIM TRUST AGREEMENT AND PROPOSED FIRE VICTIM CLAIMS RESOLUTION PROCEDURES
6353	3/17/2020	DISCLOSURE STATEMENT FOR DEBTORS' AND SHAREHOLDER PROPONENTS' JOINT CHAPTER 11 PLAN OF REORGANIZATION
7037	5/1/2020	NOTICE OF FILING OF PLAN SUPPLEMENT I CONNECTION WITH DEBTORS' AND SHAREHOLDER PROPONENTS JOINT CHAPTER 11 PLAN OF REORGANIZATION DATED MARCH 16, 2020
7394	5/18/2020	AFFIDAVIT OF SERVICE RE: SOLICITATION PACKAGE BALLOTS



BANKRUPTCY DOCKET NUMBER	DATE ENTERED IN THE BANKRUPTCY DOCKET	BRIEF DESCRIPTION OF THE DOCUMENT OR TRANSCRIPT
7399	5/18/2020	ORDER PURSUANT TO 11 U.S.C. §363(b) AND 105(a) AND FED. R. BANKR. P. 9019(I) APPROVING SETTLEMENTS WITH FEDERAL AND STATE AGENCIES OF GOVERNMENTAL AGENCY FIRE CLAIMS, AND (II) GRANTING RELATED RELIEF
7597	5/26/2020	MEMORANDUM OF OBJECTION OF ADVENTIST HEALTH, AT&T, PARADISE ENTITIES AND COMCAST TO TRUST DOCUMENTS
7820	6/8/2020	EMERGENCY PLEADING IN REPLY TO THE DISCUSSION ABOUT THE NEED FOR ESTIMATION OF CLAIMS FROM JUDGE JAMES DONATO, U.S. DISTRICT COURT JUDGE FOR THE NORTHERN CALIFORNIA DISTRICT OF CALIFORNIA FILED BY THERESA ANN MCDONALD
7858	6/9/2020	ORDER TERMINATING ESTIMATION PROCEEDINGS
7882	6/10/2020	JOINDER BY HAUM HEDLUND ARISTEI BOLDMAN CAMP FIRE VICTIMS CLIENTS IN CREDITOR THERESA ANN MCDONALD'S EMERGENCY PLEADING IN REPLY RE: NEED FOR ESTIMATION OF CLAIMS FROM JUDGE JAMES DONATO U.S. DISTRICT COURT FOR THE NORTHERN DISTRICT OF CALIFORNIA
7890	6/11/2020	EMERGENCY PLEADING BY THERESA ANN MCDONALD IN RESPONSE TO THE ORDER TERMINATING ESTIMATION PROCEEDINGS BY DISTRICT COURT JUDGE JAMES DONATO
7899	6/11/2020	JOINDER BY CERTAIN FIRE VICTIMS TO FURTHER OBJECTIONS REGARDING ESTIMATION AND CONFIRMATION FILED BY MCDONALD AND BY BAUM, ET AL
7918	6/12/2020	ORDER APPROVING THE PARTIES' JOINT STIPULATION REGARDING THE REGISTRATION RIGHTS AGREEMENT AND RELATED AGREEMENTS OF THE FIRE VICTIM TRUST
8022	6/19/2020	FINAL REPORT OF OFFICIAL COMMITTEE OF TORT CLAIMANTS' INVESTIGATION OF VOTING RESULTS
8034	6/19/2020	OBJECTION TO FINAL REPORT OF OFFICIAL COMMITTEE OF TORT CLAIMANTS' INVESTIGATION OF VOTING RESULTS

BANKRUPTCY DOCKET NUMBER	DATE ENTERED IN THE BANKRUPTCY DOCKET	BRIEF DESCRIPTION OF THE DOCUMENT OR TRANSCRIPT
8048	6/19/2020	DEBTORS' AND SHAREHOLDER PROPONENTS' JOINT CHAPTER 11 PLAN OF REORGANIZATION DATED JUNE 19, 2020
8053	6/20/2020	ORDER CONFIRMING DEBTORS' AND SHAREHOLDER PROPONENTS' JOINT CHAPTER 11 PLAN OF REORGANIZATION DATED JUNE 19, 2020
8057	6/21/2020	NOTICE OF FILING OF NINTH SUPPLEMENT TO PLAN SUPPLEMENT IN CONNECTION WITH DEBTORS' AND SHAREHOLDER PROPONENTS' JOINT CHAPTER 11 PLAN OF REORGANIZATION
8074	6/22/2020	JOINT STATEMENT OF THE TCC, TRUSTEE, DEBRA GRASSGREEN AND KARL KNIGHT, AND ERIC AND JULIE CARLSON REGARDING UNRESOLVED OBJECTIONS TO THE FIRE VICTIMS CLAIMS RESOLUTION PROCEDURES
8080	6/23/2020	NOTICE OF ERRATA TO JOINT STATEMENT OF THE TCC, TRUSTEE, DEBRA GRASSGREEN AND KARL KNIGHT, AND ERIC AND JULIE CARLSON REGARDING UNRESOLVED OBJECTIONS TO THE FIRE VICTIMS CLAIMS RESOLUTION PROCEDURES
8137	6/26/2020	EMERGENCY PLEADING (MOTION) BY THERESA ANN MCDONALD REQUESTING RECONSIDERATION OF THE IDENTIFICATION OF PARTIES WHO TIMELY OBJECTED TO THE FIRE VICTIMS CLAIMS RESOLUTION PROCEDURE
8199	6/29/2020	ORDER DIRECTING DEBTORS, THE TCC AND FIRE VICTIMS' TRUSTEE TO RESPOND TO MOTION
8235	7/1/2020	ORDER ON THE JOINT STATEMENT OF THE TCC, TRUSTEE, DEBRA GRASSGREEN AND KARL KNIGHT, AND ERIC AND JULIE CARLSON, JOIND, IN PART BY MARY WALLACE, REGARDING UNRESOLVED OBJECTIONS TO THE FIRE VICTIM CLAIMS RESOLUTION PROCEDURES
8322	7/8/2020	REORGANIZED DEBTORS' STATEMENT IN RESPONSE TO THE EMERGENCY PLEADING OF THERESA ANN MCDONALD REQUESTING RECONSIDERATION OF THE IDENTIFICATION OF PARTIES WHO TIMELY OBJECTED TO THE FIRE VICTIM CLAIMS RESOLUTION PROCEDURES

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8329	7/8/2020	JOINT RESPONSE OF THE OFFICIAL COMMITTEE OF TORT CLAIMANTS AND THE FIRE VICTIM TRUSTEE TO THERESA ANN MCDONALD'S MOTION FOR RECONSIDERATION
8331	7/8/2020	RESPONSE BY THE SINGLETON LAW FIRM VICTIM CLAIMANTS TO THERESA ANN MCDONALD'S MOTION FOR RECONSIDERATION OF THE IDENTIFICATION OF PARTIES WHO TIMELY OBJECTED TO THE FIRE VICTIMS CLAIMS RESOLUTION PROCEDURE
8340	7/8/2020	REPLY TO THE RESPONSE OF THE OFFICIAL COMMITTEE OF TORT CLAIMANTS AND THE FIRE VICTIM TRUSTEE TO THERESA MCDONALD'S MOTION FOR RECONSIDERATION
8435	7/16/2020	APPELLANTS' STATEMENT (ADVENTISIT'S_ OF ISSUES TO BE PRESENTED ON APPEAL AND DESIGNATION OF RECORD ON APPEAL

July 16, 2020

Theresa Ann McDonald  
Theresa Ann McDonald